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NOT FOR SERVICE OF LITIGATION PAPERS

May 27, 2020

BY ECF

Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.,
USDC, SDNY Case No. 19 Civ. 2645 (AJN) (KHP)**

Dear Magistrate Judge Parker:

We represent Defendants Felix Sater, Bayrock Group, Inc., Global Habitat Solutions, Inc., Daniel Ridloff and RRMI-DR LLC (collectively, the “Sater Defendants”).

As Your Honor may recall, during the last status conference, we mentioned that in connection with the non-party subpoena served by Plaintiffs upon non-party witness Arnie Herz (“Herz”), former counsel to some of the Sater Defendants and to certain interested non-parties, we would be negotiating a stipulation and proposed order pursuant to Federal Rule of Evidence 502 (“Rule 502”). We are pleased to report that the Sater Defendants and interested non-parties Triadou SPV S.A., Argon Holding Corp., Syracuse Center LLC, Tri-County Mall Investors, LLC, Swiss Development Group S.A., SDG Capital S.A., Ilyas Khrapunov, Elvira Kudryashova, RPM Maro LLC, RPM USA, LLC, and World Health Networks, Inc. and Herz have entered into a Rule 502 stipulation to resolve the issues related to any document production by Mr. Herz. We respectfully request that the Court so-order same. We are simultaneously filing the proposed Rule 502 Order on ECF.

We thank Your Honor for her time and attention to this matter.

Respectfully submitted,

/s/ Jill Levi

Jill Levi

cc: All Counsel by ECF
Alex Hassid, Esq. (by email)
Andrew Solomon, Esq. (by email)
Arnie Herz, Esq. (by email)